

**REMARKS****INTRODUCTION:**

In accordance with the foregoing, claim 2 has been cancelled, claims 1, 8, 10, 14, and 22 have been amended, and no claims have been added. Support for the claim amendments may be found at least at paragraphs [0035] and [0037], and therefore no new matter is being presented.

Claims 1-25 are pending and under consideration. Reconsideration is respectfully requested.

**REJECTIONS UNDER 35 U.S.C. §102 and 103:**

Claims 1 and 22 stand rejected under 35 U.S.C. §102(b) in view of U.S. Patent No. 6,891,528 issued to Houston ("Houston"). Claims 2-21 and 23-25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Houston. The rejections are traversed and reconsideration is respectfully requested for at least the following reasons.

Amended independent claim 1 recites at least the following features:

at least one identification pin spaced from the base pin and touching or not touching the key signal input plate so as to output the specific signal corresponding to the symbol, the at least one identification pin being shorter than the base pin

Houston is directed to an interchangeable keyboard with self-defining keys. Each of the self-defining keys of Houston includes a key post, the bottom of which includes eight cylindrical cavities (*Houston*, cols. 2-3, lines 60-7). Metallic pins may be inserted into the cylindrical cavities in various combinations so as to uniquely identify each key (*Houston*, col. 3, lines 7-13).

In contrast to the above-recited features of the present application, Houston discloses using from one to eight pins for key identification, i.e., using various combinations of pins for identification only. (*Houston*, col. 3, lines 13-20). Houston does not suggest or disclose "the at least one identification pin being shorter than the base pin."

In rebuttal to Applicants' previous arguments that the obviousness rejection based on designer's choice is improper, the current Office Action asserts that the present application "does not give a benefit or advantage to a base pin longer than the identification pins." Applicants respectfully disagree.

As an example only and not by way of limitation, Applicants note paragraph [0035] of the specification as originally filed, which states in relevant part:

Preferably, the identification pin 33 is shorter than the base pin 31, so that when a key 11 is pushed, the base pin 31 first touches the key signal input plate 50 and then the identification pin 33 touches or does not touch the key signal input plate 50. Therefore, an operation signal related to whether a certain key 11 is operated or not is first input, and then the specific signal corresponding to the symbol of the certain key 11 is input.

As can be seen, the specification provides at least one benefit derived from the base pin being longer than the identification pin, which is "an operation signal related to whether a certain key 11 is operated or not is first input, and then the specific signal corresponding to the symbol of the certain key 11 is input." Therefore, the rationale offered in the Office Action is unpersuasive and the rejection fails to establish a prima facie case of obviousness.

The assertions found in the Office Action are merely conclusory and without supporting evidence, e.g., the statement that, since there is not benefit or advantage to having the base pin longer than the identification pin," the feature is not a patentable distinction and is only a design choice. The Office Action offers absolutely no reference as teaching the missing claim limitation. Moreover, the Office Action fails to offer any citation to the prior art as providing a suggestion or motivation to modify Houston, nor does the Office Action provide evidence demonstrating an implicit motivation to modify Houston. Even assuming, arguendo, that a particular benefit is not described in the specification, it is incumbent upon the Examiner to produce evidence to support an obviousness conclusion and not simply declare the claimed invention an obvious design choice. See *In re Garrett*, 1986 Pat. App. LEXIS 8 (Bd. Pat. App. 1986). Accordingly, each contention is traversed.

Accordingly, Applicants respectfully submit that amended independent claim 1 patentably distinguishes over the cited reference, and should be allowable for at least the above-mentioned reasons. Since similar features recited by independent claim 22, with potentially differing scope and breadth, are not taught or disclosed by the reference, the rejection should be withdrawn and claim 22 also allowed.

Further, Applicant respectfully submits that claims 3-7 and 23-25, which variously depend from independent claims 1, and 22, should be allowable for at least the same reasons as claims 1 and 22, as well as for the additional features recited therein.

Amended independent claim 8 recites at least the following features:

a plurality of keys each having a key cap, a key body, and an arrangement of at least one pin on the bottom of the key body, wherein keys having different size and shape tops relative to tops of other keys may be incorporated into the frame by a user

Houston fails to suggest or disclose at least all of the above-recited features.

Accordingly, Applicants respectfully submit that amended independent claim 8 patentably distinguishes over the cited reference, and should be allowable for at least the above-mentioned reasons. Since similar features recited by independent claim 14, with potentially differing scope and breadth, are not taught or disclosed by the reference, the rejection should be withdrawn and claim 14 also allowed.

Further, Applicant respectfully submits that claims 9-13 and 15-21, which variously depend from independent claims 8 and 14, should be allowable for at least the same reasons as claims 8 and 14, as well as for the additional features recited therein.

REQUEST FOR ENTRY IN ACCORDANCE WITH 37 CFR 1.116:

Entry of these amendments in accordance with 37 CFR 1.116 is respectfully requested because the amendments either comply with requirements of form expressly set forth in the previous Office Action, or present the rejected claims in better form for consideration on appeal.

CONCLUSION

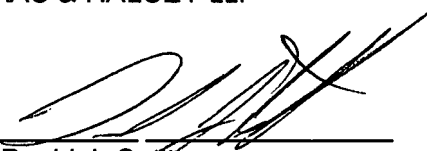
There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,  
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Date: Sept. 4, 2007

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